UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	indictment CR 12-295 PAMIAJB
Plaintiff,) (18 U.S.C. § 2)
) (18 U.S.C. § 1951)
v.) (18 U.S.C. § 922(g)(1))
) (18 U.S.C. § 924(a)(2))
(1) ERIC WADE FORCIER, and) (18 U.S.C. § 924(c)(1)(A))
) (18 U.S.C. § 924(d)(1))
(2) JULIE ANN CAMPANA,) (28 U.S.C. § 2461(c))
)
)
Defendants.)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Interference with Commerce by Robbery)

- 1. At all times material to this Indictment the Americas Best Value Inn and Suites, located at 1420 Riverview Drive, Northfield, Minnesota, was operating as a hotel, providing lodging for a significant number of customers traveling to Minnesota from out of state and receiving goods and services including food, toiletry items, cleaning and repair supplies, cable television and internet service, and marketing assistance from out of state providers, and was a business engaged in and affecting interstate commerce.
- 2. On or about October 29, 2012, in the State and District of Minnesota, the defendants,

ERIC WADE FORCIER, and JULIE ANN CAMPANA,

each aiding and abetting the other, did, unlawfully and knowingly

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obstruct, delay and affect, and attempt to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that defendants did unlawfully and knowingly take and obtain personal property of Americas Best Value Inn and Suites consisting of United States currency and three cordless telephones from the presence of a victim employee, against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person, all in violation of Title 18, United States Code, Sections 2 and 1951.

COUNT 2

(Using, Carrying, Possessing and Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about October 29, 2012, in the State and District of Minnesota, the defendants,

ERIC WADE FORCIER, and JULIE ANN CAMPANA,

each aiding and abetting the other, during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, the crime set forth in Count 1 of this Indictment, which is hereby realleged and incorporated herein by reference, did knowingly and unlawfully use and carry a firearm, namely, a .32 caliber FEG pistol, serial number BK1827, and in furtherance of such crime, did knowingly and unlawfully

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possess and brandish said firearm, in violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A).

COUNT 3

(Felon in Possession of a Firearm)

On or about October 29, 2012, in the State and District of Minnesota, the defendant,

ERIC WADE FORCIER,

having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, namely,

Crime Committed	Place of Conviction	Date of Conviction (on or about)
2nd degree drug possession	Dakota County, MN	November 24, 2008
Possession of stolen property	Dakota County, MN	April 1, 2008
5th degree drug possession	Dakota County, MN	May 21, 2007
5th degree drug possession	Dakota County, MN	May 21, 2007
Fleeing police in a motor vehicle	Dakota County, MN	May 21, 2007

did knowingly and unlawfully possess, in and affecting interstate commerce, a firearm, namely, a .32 caliber FEG pistol, serial number BK1827, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION

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If convicted of Count 1, 2 or 3 of this indictment, the defendants shall forfeit to the United States any firearms and ammunition involved in or used in such violations including, but not limited to, a .32 caliber FEG pistol, serial number BK1827 and ammunition, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

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UNITED	STATES	ATTORNEY	FOREPERSON